

1 RICHARD E. ZUCKERMAN  
2 Principal Deputy Assistant Attorney General

3 RICK WATSON  
4 Trial Attorney, Tax Division  
U.S. Department of Justice  
P.O. Box 683  
Washington, D.C. 20044  
202-353-0300 (v)  
202-307-0054 (f)  
[Rickey.Watson@usdoj.gov](mailto:Rickey.Watson@usdoj.gov)

5  
6  
7 *Attorneys for United States*

8  
9 IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA, )  
11 Plaintiff, ) Case No. 2:17-cv-3048-GWN-DJA  
12 v. )  
13 ) **JOINT MOTION TO VACATE AND**  
ESTATE OF SANDRA DE FORREST ) **RESET PRETRIAL ORDER**  
14 ) **DEADLINE**  
15 Defendant. )  
16 \_\_\_\_\_)

17 The United States of America and Defendant Estate of Sandra De Forrest (“the parties”),  
18 by and through their undersigned counsel, hereby move the Court to vacate and reset the  
19 deadline to submit a proposed pretrial order in this case for at least 60 days. For the reasons set  
20 forth below, the parties submit that good cause exists for such action.

21 1. On January 13, 2020, the Defendant submitted a settlement offer to the United  
22 States. Due to the amount at issue in this case, that settlement offer must be reviewed by senior  
23 Department of Justice and IRS officials.

1       2. On May 31, 2020, while Defendant's settlement offer was still under  
2 consideration by the Department, this Court ordered the parties to submit a proposed pretrial  
3 order by June 30, 2020. Dkt. # 52.

4       3. On June 12, 2020, after further settlement discussions between the parties, the  
5 Defendant submitted a revised formal settlement offer to the United States. Due to the amount at  
6 issue in this case, that settlement offer must be reviewed by senior Department of Justice and  
7 IRS officials prior to being accepted by the Department. That review will not be completed by  
8 June 30, 2020.

9       4. Granting this motion would permit the parties to attempt to resolve this case  
10 without further litigation expense, thereby conserving the resources of the parties and the Court.

11       5. Granting the motion will not impact any other deadline in this case. Therefore,  
12 this requested extension will not prejudice the timely, orderly, efficient resolution of this case.

13       WHEREFORE, the parties hereby move the Court to vacate the deadline to submit a  
14 proposed pretrial order and reset it to a date no sooner than 60 days from the date of such action.

1 Dated: June 26, 2020.

2 Respectfully submitted,

3 RICHARD E. ZUCKERMAN  
4 Principal Deputy Assistant Attorney General

5 /s/Rick Watson  
6 RICK WATSON  
7 Trial Attorney, Tax Division  
U.S. Department of Justice

8 *Counsel for the United States*

9 AMANDA E. LITT, ESQ.  
10 Nevada State Bar NO. 12434  
11 RYAN LOOSVELT, ESQ.  
Nevada State Bar No. 8550  
Litt Law Firm LLC  
3202 West Charleston Boulevard  
Las Vegas, Nevada 89102

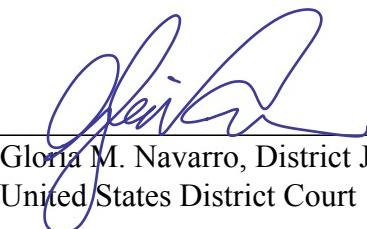
12 /s/Brian C. McManus  
13 BRIAN C. MCMANUS, ESQ.  
*(Pro Hac Vice)*  
14 MIRIAM L. FISHER, ESQ.  
*(Pro Hac Vice)*  
15 Latham & Watkins LLP  
555 Eleventh Street, NW  
16 Suite 1000  
Washington, D.C. 20004-1304

17 *Attorneys for Sandra J. de Forrest*

18 **ORDER**

19 **IT IS HEREBY ORDERED** that the above Joint Motion to Vacate and Reset Pretrial  
Order Deadline, (ECF No. 53), is **GRANTED**. The parties shall submit a proposed joint pretrial  
order by August 31, 2020.

20 **DATED** this 1 day of July, 2020.

21  
22  
23  
24   
Gloria M. Navarro, District Judge  
United States District Court